

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOSEPH MANTHA on behalf of himself
and others similarly situated,

Plaintiff,

v.

QUOTEWIZARD.COM, LLC

Defendant.

Case No. 1:19-cv-12235-LTS

**SECOND JOINT STIPULATION REGARDING CLASS DISCOVERY PRODUCTION
DEADLINE AND STATUS REPORT DEADLINE**

Now Come Plaintiff Joseph Mantha (“Mantha”) and Defendant QuoteWizard.com, LLC (“QuoteWizard”) (the “Parties”) and hereby file this second Joint Stipulation regarding QuoteWizard’s class discovery production deadline, and the Parties’ subsequent deadline to file a Status Report, and respectfully request that the Court adopt their Joint Stipulation set forth herein:

1. Pursuant to an Order issued on August 15, 2022, the Court required QuoteWizard to produce certain information and documents in class discovery. *See* ECF No. 292. The majority of the production was required by September 16, 2022 (with the exception of records held by Drips Holdings, LLC and not yet produced to QuoteWizard). *See id.* The Court also ordered the Parties, by September 23, 2022, to file a “joint status report setting forth their joint or separate positions as to a schedule to govern the remaining fact discovery, any expert discovery, and the class certification motion as well as any other matter the parties anticipate requiring a schedule for other than the actual trial which at the present time the Court anticipates will occur following the resolution of the class certification motion.” *Id.*, pp. 9-10.

2. QuoteWizard and Mantha stipulated to an extension of that discovery production deadline to October 7, 2022, due to the volume and size of the records at issue, and the Court adopted/granted this Joint Stipulation. *See* ECF Nos. 296, 297. In addition, the Court extended the deadline to file the joint status report to October 14, 2022. *See* ECF No. 297.

3. QuoteWizard has produced many responsive records already, and plans to make a large production (in terms of both volume and file size) on October 7, 2022. QuoteWizard requested of Mantha another ten (10) days, or to and including October 17, 2022, to complete its production due to the sheer volume of the files and some technical glitches that have been encountered in downloading/transmitting the files. Mantha's counsel has agreed to the extension. Therefore, the Parties stipulate that QuoteWizard may have to and including October 17th to complete its production under ECF No. 292, and respectfully request the Court to adopt the same.

4. Consistently, the Parties request to and including October 24, 2022 to file their post-production joint status report.

5. The Parties further note that the Court's Scheduling Order identified October 17, 2022 as the deadline for expert reports. *See* ECF No. 272. Given the current and requested extended deadlines for QuoteWizard to complete its production under ECF No. 292, the Parties assume that the October 17, 2022 expert disclosure deadline is essentially moot and will be extended once the Court has received and considered the Parties' post-production joint status report. However, should the Court require a formal motion to extend the deadline, the Parties are prepared to file one.

WHEREFORE, the Parties respectfully request that the Court adopt their joint stipulation that QuoteWizard may have until October 17, 2022 to complete its production under ECF No. 292, and the Parties until October 24, 2022 to file their post-production joint status report.

Dated: October 6, 2022

Respectfully submitted,
Joseph Mantha,
by his attorneys,

/s/ Edward A. Broderick
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Respectfully submitted,
QuoteWizard.com, LLC,
By its attorneys,

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CERTIFICATE OF SERVICE

I, Christine M. Kingston, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

Dated: October 6, 2022

/s/ Christine M. Kingston